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ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS **DALLAS DIVISION**

IN RE: Case No. 08-36705-BJH-11 § SUPERIOR AIR PARTS, INC. § **DEBTOR-IN POSSESSION.**

MOTION TO EXPEDITE HEARING ON MOTION TO APPROVE SOLICITATION LETTER

TO: THE HONORABLE BARBARA J.HOUSER, UNITED STATES BANKRUPTCY JUDGE:

NOW COMES the Official Committee of Unsecured Creditors (the "Committee"), by and through counsel of record, and files this their Motion to Expedite Hearing on Motion to Approve Solicitation Letter (the "Motion to Expedite"). The Committee respectfully states:

I. JURISDICTION AND VENUE

- 1) The Court exercises subject matter jurisdiction with regard to the Motion to Expedite pursuant to 28 U.S.C. §§ 157 and 1334.
 - Venue is proper in this Court under 28 U.S.C. §§ 1408 and 1409. 2)

II. PROCEDURAL BACKGROUND

- This case was commenced by the filing of a voluntary petition under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division on December 31, 2008 (the "Petition Date"). Since the Petition Date, the Debtor has continued to operate their businesses as a debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.
- 4) On or about January 29, 2009, the United States Trustee certified and appointed the Committee in accordance with Section 1102(a)(1) of the Bankruptcy Code. The members of the Committee, as amended, include (1) AVStar Aircraft Accessories, Inc., represented by Ronald J. Weaver, (2) Eck Industries, Inc., represented by Phil Eck, (3) KSPG Automotive Brazil LTDA, represented by Werner Wilhelm Albus and Valeria de Freitas Mesquita, (4) Hartford Aircraft Products represented by Jim Griffin, (5) Seal Science, Inc., represented by Piyush Kakar, and (6) Zanzi, S.P.A., represented by Stefano Gazzola.
- 5) On or about June 23, 2009, the Debtor and the Committee proposed the First Amended Chapter 11 Plan (the "Plan").
 - 6) A hearing on the Disclosure Statement is set for July 6, 2009.

III. RELIEF REQUESTED

- 7) Given the upcoming Disclosure Statement hearing and the mailing of ballots to follow, the Committee would like to be able to send the proposed Solicitation Letter prior to the time that ballots are due for the Plan.
- 8) Therefore, the Committee prays for an expedited hearing to coincide with the hearing on the Disclosure Statement on July 6, 2009. The Committee does not believe any party in interest will be prejudiced by an expedited hearing.

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WHEREFORE, PREMISES CONSIDERED, the Committee respectfully requests that the Court (i) enter an order approving the Motion to Expedite; (ii) setting a hearing for July 6, 2009 at 4:00 p.m. and (iii) grant the Committee any and all other relief, at law or in equity, to which it may show himself justly entitled.

Dated: July 2, 2009 Dallas, Texas

Respectfully submitted,

BAKER & MCKENZIE

By: /s/ Elliot D. Schuler

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused a true and correct copy of the foregoing to be served upon the persons or entities identified below via electronic mail, and on all other parties via the Court's ECF filing system on July 2, 2009.

/s/ Elliot D. Schuler
Elliot D. Schuler

CERTIFICATE OF CONFERENCE

The undersigned attorney hereby certifies that he conferred with Stephen Roberts, Debtor's Counsel on July 2, 2009 and he did not oppose the expedited setting for the Motion to Approve Solictation Letter.

/s/ Elliot D. Schuler
Elliot D. Schuler